Mark J. Zausmer Richard C. Kaufman Gary K. August Michael L. Caldwell Michael C. Lewis Heidi D. Hudson Mischa M. Boardman<sup>1</sup> Nicole M. Wright Matthew G. McNaughton Cameron R. Getto Cinnamon A. Rice Amy Sitner Applin

# $Z \, | \, K \, | \, A \, | \, C$ Zausmer, Kaufman, August & Caldwell, P.C.

FARMINGTON HILLS & LANSING

Elizabeth R. Arnone Jason W. Baas Emily M. Ballenberger Michael D. Crow John C. Cusmano Lynne S. DeBell Nathan J. Fink Ian L. Gross Jamie J. Janisch<sup>a</sup> Andrea M. Johnson Crystal S. Kakos Daniel J. McCarthy Marc D. McDonald April E. Moore Jeremy M. Mullett Shaun M.J. Neal Alicia M. Oaks Bryan R. Padgett Heather R. Pillot Michael A. Schwartz Devin R. Sullivan<sup>1</sup> Lauren M. Wawrzyniak Darnella D. Williams James C. Wright<sup>3</sup> Kyle T. Zwiren

FARMINGTON HILLS 31700 Middlebelt Road, Suite 150 Farmington Hills, MI 48334-2374

(248) 851-4111 phone (248) 851-0100 fax

<sup>1</sup>Also Admitted in IL <sup>2</sup>Also Admitted in KY <sup>3</sup>Also Admitted in OH

February 3, 2014

Clerk of the Court Ingham County Circuit Court Mason Courthouse 341 S. Jefferson Mason, MI 48854

RE:

In the Matter of Cadillac Insurance Company, In Liquidation Commissioner of Insurance vs. Cadillac Insurance Company Case No. 89-64126-CR
Our File No. 1080-0000L

#### Dear Clerk:

Enclosed for filing please find the following documents relative to the above-referenced matter:

- 1. \$20.00 Petition Fee:
- 2. Two Notices of Hearing (original and Judge's copy of each);
- 3. Petition for Order Declaring Furniture Abandoned and Allowing Receiver to Dispose of Furniture Accordingly with Brief in Support (original and Judge's copy);
- 4. Liquidator's Verified Petition for Approval of Liquidator's Decision Pertaining to Treatment of Remaining Assets (original and Judge's copy); and
- 5. Proof of Service (original and Judge's copy).

Please deliver the Judge's copies to Judge Collette. Thank you for your assistance with this matter.

Sincerely yours,

ZAUSMER, KAUFMAN, AUGUST & CALDWELL, P.C.

Amy S. Applin

ASA:dmt Enclosures

cc: Parties Identified on Proof of Service (w/enclosures)

James Gerber (w/enclosures)

www.zkac.com

#### STATE OF MICHIGAN

#### IN THE CIRCUIT COURT FOR THE COUNTY OF INGHAM

ln	the Matter	r of CADIL	LAC INS	UKANCE (	JOMPANY,
IN	LIQUIDA	ATION			

BILL SCHUETTE, Attorney General of the State of Michigan, ex rel ANN E. FLOOD, Director of the Department of Insurance and Financial Services of the State of Michigan,

File No.: 89-64126-CR

Hon. William E. Collette

Petitioners,

VS.

CADILLAC INSURANCE COMPANY, a Michigan Corporation,

Respondent.

MARK J. ZAUSMER (P31721) Special Assistant Attorney General AMY SITNER APPLIN (P46900) ZAUSMER, KAUFMAN, AUGUST & CALDWELL, P.C. Attorneys for Petitioners 31700 Middlebelt Road, Suite 150 Farmington Hills, MI 48334 (248) 851-4111

## **NOTICE OF HEARING**

TO: Interested Parties

PLEASE TAKE NOTICE THAT the Liquidator's Verified Petition for Approval of Liquidator's Decision Pertaining to Treatment of Remaining Assets will be brought on for

hearing before this Honorable Court on Wednesday, February 12, 2014 at 10:00 a.m., or as soon thereafter as counsel may be heard.

ZAUSMER, KAUFMAN, AUGUST,

& CALDWELL, P.C.

MARK J. ZAUSMER (P31721)

Special Assistant Attorney General

AMY S. APPLIN (P46900) Attorneys for Petitioners

31700 Middlebelt Road, Suite 150

Farmington Hills, MI 48334

(248) 851-4111

Dated: February 3, 2014

#### STATE OF MICHIGAN

### IN THE CIRCUIT COURT FOR THE COUNTY OF INGHAM

I	ln the	Matter	of CADL	LLAC I	NSURA	ANCE C	OMPAN'	Y,
I	IN LI	QUIDA	TION					

BILL SCHUETTE, Attorney General of the State of Michigan, ex rel ANN E. FLOOD, Director of the Department of Insurance and Financial Services of the State of Michigan,

File No.: 89-64126-CR

Hon, William E. Collette

Petitioners,

VS.

CADILLAC INSURANCE COMPANY, a Michigan Corporation,

Respondent.

MARK J. ZAUSMER (P31721) Special Assistant Attorney General AMY SITNER APPLIN (P46900) ZAUSMER, KAUFMAN, AUGUST & CALDWELL, P.C. Attorneys for Petitioners 31700 Middlebelt Road, Suite 150 Farmington Hills, MI 48334 (248) 851-4111

## **NOTICE OF HEARING**

TO: Interested Parties

PLEASE TAKE NOTICE THAT the Petition for Order Declaring Furniture Abandoned and Allowing Receiver to Dispose of Furniture Accordingly will be brought on for hearing

before this Honorable Court on Wednesday, February 12, 2014 at 10:00 a.m., or as soon thereafter as counsel may be heard.

ZAUSMER, KAUFMAN, AUGUST,

& CALDWELL, P.C.

MARK J. ZAUSMER (P31721)

Special Assistant Attorney General

AMY S. APPLIN (P46900) Attorneys for Petitioners

31700 Middlebelt Road, Suite 150

Farmington Hills, MI 48334

(248) 851-4111

Dated: February 3, 2014

## STATE OF MICHIGAN

# IN THE CIRCUIT COURT FOR THE COUNTY OF INGHAM

In the Matter of CADILLAC INSURANCE COMPANY, IN LIQUIDATION	
BILL SCHUETTE, Attorney General of the State of Michigan, ex rel ANN E. FLOOD, Director of the Department of Insurance and Financial Services of the State of Michigan,	File No.: 89-64126-CR Hon. William E. Collette
Petitioners,	
VS.	
CADILLAC INSURANCE COMPANY, a Michigan Corporation,	
Respondent.	
MARK J. ZAUSMER (P31721) Special Assistant Attorney General AMY SITNER APPLIN (P46900) ZAUSMER, KAUFMAN, AUGUST & CALDWELL, P.C. Attorneys for Petitioners 31700 Middlebelt Road, Suite 150 Farmington Hills, MI 48334 (248) 851-4111	
PROOF OF SERVIC	<u>E</u>
STATE OF MICHIGAN )	
COUNTY OF OAKLAND )	
DAWN M. TROMBLEY, being first duly sworn,	deposes and states that on February 3,

2014, she served a copy of Petition for Order Declaring Furniture Abandoned and Allowing

Receiver to Dispose of Furniture Accordingly with Brief in Support, Liquidator's Verified Petition for Approval of Liquidator's Decision Pertaining to Treatment of Remaining Assets, Notices of Hearing (2) and this Proof of Service via first class mail on the following individuals by placing said documents in sealed envelopes, with prepaid, first-class postage fully affixed, and depositing same in the U.S. mail in Farmington Hills, Michigan, or, if so specified below, via email:

Louis J. Porter, Esq. Fried Porter PLLC 29800 Telegraph Road Southfield, MI 48034

Benjamin W. Jeffers, Esq. Dykema Gossett PLLC 400 Renaissance Center Detroit, MI 48243

Arizona Insurance Guaranty Association & Mr. Michael Surguine msurguine@azinsurance.gov

California Insurance Guarantee Association c/o Wayne Wilson P. O. Box 29066 Glendale, CA 91209-9066

Florida Insurance Guaranty Association <a href="mailto:srobinson@agfgroup.org">srobinson@agfgroup.org</a>

Florida Life & Health Insurance Guaranty Association c/o Mr. William Flack 3740 Beach Blvd, Suite 201A Jacksonville, FL 32207-3877

Georgia Insurers Insolvency Pool c/o Michael Marchman 2177 Flintstone, Suite R Tucker, GA 30084 Indiana Insurance Guaranty Association, Janis Funk, Executive Director jfunk@quadassoc.org; rvasil@quadassoc.org

Louisiana Insurance Guaranty Association c/o John Wells 2142 Quail Run Drive Baton Rouge, LA 70808-4126

Michigan Life & Health Insurance Guaranty Association c/o John Colpean 1640 Haslett Road, Suite 160 Haslett, MI 48840-8683

Michigan Property & Casualty Guaranty Association c/o Mr. Tom Kujawa P. O. Box 531266 Livonia, MI 48153-1266

Mississippi Insurance Guaranty Association c/o Arthur Russell arussell@msiga.net

Nevada Insurance Guaranty Association c/o Bruce Gilbert 3821 Charleston Blvd., Suite 100 Las Vegas, NV 89102-1859

Ohio Life & Health Guaranty Association sdurish@ohioga.org

Ohio/West Virginia Insurance Guaranty Association <a href="mailto:sdurish@ohioga.org">sdurish@ohioga.org</a>

Texas Property & Casualty Insurance Guaranty Association c/o Mr. Marvin Kelly 9120 Burnet Road Austin, TX 78758 Top 10 largest non-Guaranty Fund Class 1 Claims:

Claim No.	MI00012	(via e	mail)

Claim No.	MI02727
Claim No.	TX00083
Claim No.	IN00071
Claim No.	MI02552A
Claim No.	MI02729
Claim No.	MI02558

Claim No. AR00001

Claim No. IN00075

Claim No. IN00117

(The sealed list of names and addresses of claimants was filed with the Court on or about July 5, 2011, consistent with the Court's October 14, 2010, Order in this matter).

DAWN M. TROMBLEY